

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	Chapter 7
)	
Jennifer Espinosa,)	Case No. 23-08540
)	
Debtor.)	Judge Barnes

NOTICE OF MOTION

TO: Neville Reid, Chapter 7 Trustee (via Electronic Court Notice)

PLEASE TAKE NOTICE that on January 3, 2024 at 9:00 a.m., I will appear before the Honorable Judge Thorne, or any judge sitting in that judge's place, either in courtroom 744 of the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604 or electronically as described below, and present the Motion to Extend Time, a copy of which is attached.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by Zoom using as telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 161 329 5276 and the passcode is 433658. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

/s/ David H. Cutler

CERTIFICATE OF SERVICE

I, David Cutler, certify that I served a copy of this notice and the attached motion on the Trustee via electronic Court notice on December 13, 2023.

/s/ David H. Cutler

Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
Phone: (847) 673-8600

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IN RE:)	Chapter 7
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**MOTION TO EXTEND TIME TO FILE DEBTOR'S
REMAINING SCHEDULES AND OTHER DOCUMENTS**

NOW COMES the Debtor(s), Jennifer Espinosa, by and through her attorneys, Cutler & Associates, Ltd., and move(s) this Court to grant her until December 22, 2023 to file the remaining Schedules and other documents. In support of this Motion, the Debtor respectfully states and alleges as follows:

1. The Debtor filed his petition for relief under Chapter 13 of the United States Bankruptcy Code on June 29, 2023. The Debtor converted her case to a Chapter 7 on November 29, 2023.
2. The Debtor's remaining schedules and other documents would, in absence of this motion, be due on December 13, 2023.
3. The Debtor needs additional time to provide documents and review the remaining schedules and other documents with his attorneys before they can be filed.
4. The Debtor, therefore, requests that he be granted until December 22, 2023 to file the remaining Schedules and other documents.

WHEREFORE, the Debtor(s), Jennifer Espinosa, prays for the following relief:

- A. That the Debtor be granted until December 22, 2023 to file the remaining schedules and other documents; and
- B. For such other and further relief as this Court deems equitable and just.

Respectfully Submitted,

Dated: December 13, 2023

By: _____ /s/ David H. Cutler
One of the attorneys for the Debtor(s)

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Skokie, IL 60076
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